

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

ADAMS & BOYLE, P.C., on behalf of itself and its
patients; *et al.*,

Plaintiffs,

v.

HERBERT H. SLATERY III, Attorney General of
Tennessee, in his official capacity; *et al.*,

Defendants.

CASE NO. 3:15-cv-00705

JUDGE FRIEDMAN

MAGISTRATE JUDGE
FRENSLEY

EXPEDITED MOTION TO FILE SUPPLEMENTAL COMPLAINT

Plaintiffs Adams & Boyle, P.C., Memphis Center for Reproductive Health, and Planned Parenthood of Tennessee and North Mississippi, as well as proposed Plaintiffs Knoxville Center for Reproductive Health and Dr. Kimberly Looney (together, the “Providers”), move to file a supplemental complaint pursuant to Federal Rule of Civil Procedure 15(d). In light of the Providers’ need for urgent relief in this matter, including the temporary restraining order the Providers seek through their other motion filed today, the Court has good cause to hear this motion on an expedited basis.

In support of this motion, the Providers submit the attached Memorandum in Support of Plaintiffs’ Expedited Motion to File Supplemental Complaint, along with a copy of the proposed Supplemental Complaint. The Providers also submit a Proposed Order in support of their motion.

Dated: April 13, 2020

Respectfully submitted,

/s/ Thomas H. Castelli

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*Admitted *pro hac vice*

**Application for admission *pro hac vice*
forthcoming

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *EXPEDITED MOTION TO FILE SUPPLEMENTAL COMPLAINT* has been served on the following counsel of record through the Electronic Filing System on this 13th day of April, 2020:

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